

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

KENNETH C. GRIFFIN,

Plaintiff,

v.

INTERNAL REVENUE SERVICE and U.S.  
DEPARTMENT OF THE TREASURY,

Defendants.

Case No. 1:22-cv-24023-Scola/Goodman

**JOINT MOTION TO EXTEND RESPONSE DEADLINES RELATED TO  
DEFENDANT'S MOTION TO DISMISS**

The parties in the above captioned action (collectively, "Parties"), by and through their undersigned counsel and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, respectfully move this Court to extend the current response deadlines related to Defendant's motion to dismiss from May 9, 2023 (Plaintiff's Opposition Brief) and May 16, 2023 (Defendant's Reply Brief) to May 26, 2023 and June 21, 2023, respectively.

1. Plaintiff commenced this action on December 13, 2022. (ECF No. 1.) On March 8, 2023, Defendant moved for a forty-five day extension of time to respond to Plaintiff's complaint, which Plaintiff did not oppose. (ECF No. 21.) The Court granted that motion on March 9, 2023. (ECF No. 22.) On April 26, 2023, Defendant moved to dismiss Plaintiff's complaint. (ECF No. 23.)

2. Pursuant to Local Rule 7.1(c)(1), Plaintiff's response to the motion to dismiss is currently due on May 9, 2023, and Defendant's reply in support of the motion to dismiss is currently due on May 16, 2023.

3. Good cause exists to extend the current response deadlines related to the pending motion to dismiss from May 9, 2023 (Plaintiff's Response Deadline) and May 16, 2023 (Defendant's Reply Deadline) to May 26, 2023 and June 21, 2023, respectively, because the additional time will provide the Parties opportunities to gather additional information necessary to prepare their responsive pleadings and both Parties would benefit from the additional time.

4. Therefore, in light of the foregoing and pursuant to their agreement, the Parties respectfully request that this Court enter an order resetting the current deadlines as follows:

- a. Plaintiff may file his opposition to the motion to dismiss on or before May 26, 2023; and
- b. Defendant may file a reply in support of the motion to dismiss on or before June 21, 2023.

5. This joint motion is made in good faith and not for purposes of delay, and this Court has not previously modified or extended the deadlines for the response and reply to the pending motion to dismiss.

WHEREFORE, for the foregoing reasons, the Parties respectfully request that the Court grant this joint motion and enter the motion to dismiss briefing schedule provided above. A proposed order granting this joint motion is attached as **Exhibit A**.

Date: May 3, 2023

Respectfully Submitted,

***For Plaintiff***

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on this 3rd day of May, 2023, I filed a copy of the foregoing document with the Clerk of Court using the CM/ECF electronic filing system, which will send notification to all counsel of record.

By: /s/ Jason D. Sternberg  
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